

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CONCORD MANAGEMENT AND
CONSULTING LLC,**

Defendant.

Crim. No. 18-CR-32-2 (DLF)

GOVERNMENT’S UNOPPOSED MOTION FOR EXTENSION

The United States of America respectfully requests a two-week extension to submit proposed jury instructions. Counsel for the defendant does not oppose this request.

Under the Court’s pretrial scheduling order, proposed jury instructions are due on or before October 21, 2019. The government has been working on other matters for this case—including finalizing discovery, supplementing the bill of particulars, and responding to the defense motion to strike surplusage and the defendant’s renewed motion to dismiss—and therefore requests two additional weeks to focus on the jury instructions submission. This extension of time will not affect the April 6, 2020 trial date. The defense does not oppose this request.

Respectfully submitted,

JOHN C. DEMERS
Assistant Attorney General for National Security

JESSIE K. LIU
United States Attorney

By: /s/
Heather N. Alpino
U.S. Department of Justice
National Security Division
950 Pennsylvania Ave. NW

By: /s/
Jonathan Kravis
Luke Jones
Kathryn Rakoczy
555 Fourth Street NW

Washington, D.C. 20530
Telephone: (202) 514-2000

Washington, D.C. 20530
Telephone: (202) 252-6886

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CONCORD MANAGEMENT AND
CONSULTING LLC,**

Defendant.

Crim. No. 18-CR-32-2 (DLF)

[PROPOSED] ORDER

This matter having come before the Court on the government's unopposed motion for an extension of time, it is hereby ORDERED that the government's motion is granted. The parties shall jointly file proposed jury instructions on or before November 4, 2019.

Date:

DABNEY L. FRIEDRICH
United States District Judge